



To: Chuck Hoskin Jr., Principal Chief
From: Registration Code and Process Reform Task Force
Date: March 3, 2025

Re: Registration Code and Process Reform Task Force Report I

Chief Hoskin,

The Principal Chief’s Task Force on Registration Code and Process Reform (“Task Force”) submits Report 1 with the following recommended reforms to citizenship code and registration processes, established in Executive Order 2024-08-CTH. The Task Force reviewed data from the Registration Department and conducted a comprehensive examination of current processes as it relates to the Citizenship Code and the Registration process. In turn, this information was then utilized to identify areas in the Cherokee Nation Citizenship Code and Registration process for potential reform, to ensure the efficient and effective administration of the citizenship process and to ensure that the standards of citizenship are not only compliant with said legal authority, but aligned with important national interests shaping the recommendations outlined in this report.

On behalf of my colleagues and members of this Task Force, we appreciate the opportunity to review and inform on topics related to citizenship and registration. It is the intention of this group to not only strengthen the Cherokee Nation’s registration code but also reinforce your commitment to upholding the rights and dignity of all citizens, ensuring that the citizenship process remains transparent, equitable, and reflective of Cherokee values.

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Shella Bowlin
Cherokee Nation Secretary of State
Chair, Registration Code and Process Reform Task Force



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**Task Force Report on
Registration Code and Process Reform**

March 3, 2025

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Introduction

The Principal Chief’s Task Force on Registration Code and Process Reform (Task Force), established December 6, 2024, with objectives to recommend reforms to subject areas of the citizenship code and/or Registration processes.

Position	Name
Secretary of State (chair)	Shella Bowlin
Deputy Secretary of State (co-chair)	Canaan Duncan
Chief of Staff (member)	Corey Bunch
Cherokee Nation Registrar (member)	Derrick Vann
Attorney General (member)	Chad Harsha
Delegate to Congress and Executive Director of Government Relations (member)	Kim Teehee

In detail, the Executive Order 2024-08-CTH provides the Task Force with two objectives. The first objective is Task Force Report I to recommend reforms to the following subject areas of the Cherokee Nation Citizenship Code and/or the Registration processes, specific to:

- Role of the Registration Committee
- Relinquishment Process
- Post-relinquishment period process
- Dual enrollment/citizenship
- Alignment of Registration process with the Executive Order on Equality and the Principal Chief’s directive of June 10, 2024, to remove barriers to access to members of the 2SLGBTQ+ community
- Recommendations as to whether the Registration should adopt a comprehensive set of policies governing citizenship, photo ID and CDIB processing
- Any other statutory or process reforms recommended by the Task Force (other than subjects to be addressed in part II)

In examining potential code and process reforms, the Task Force has also been directed to take care to explore due process guarantees that maybe necessary to implement changes.

Objective two will follow that will deliver Task Force Report II including recommendations for improvements to Photo ID Technology, as well as any other statutory or process reforms recommended in Report I on June 10, 2025.

Although not required Stakeholders and Cherokee Nation citizens were engaged throughout this process through conversations on relevant topics. Conversations were conducted with CN elected officials, Tribal Registrar, CN Judiciary, Liaison to the Freedmen Community, representatives of area non-profits as well as Cherokee Nation employees, and Cherokee Nation citizens of the 2SLGBTQ+ community.

Executive Summary

To ensure efficient and effective governance, the Cherokee Nation (CN) must comply with its legal authority, national interests, and equitable practices in administering citizenship processes. A comprehensive review reveals that while processes have evolved, the Registrar operates under a single policy from the Bureau of Indian Affairs (BIA).

In response to Executive Order 2024-08-CTH, the Task Force on Registration Code and Process Reform examined the following areas of the Cherokee Nation Registration Code and processes, making the following recommendations:

Process Reform: By July 31, 2025, the Task Force recommends that the Cherokee Nation Registrar develop and adopt a comprehensive set of policies governing citizenship and Certificate of Degree of Indian Blood (CDIB) processing, as outlined in Report I.

Role of the Registration Committee: By May 30, 2025, recommended reforms include:

- o Updating appointments
- o Aligning responsibilities with Constitution of the Cherokee Nation Section 2, Article IV(a):
 - o Attending bi-annual meetings to review any code or process reforms impacting registration, eligibility, and activity, including a bi-annual report from the Registration Department

Relinquishment Process: By September 30, 2025, recommended reforms include:

- o Revising legislative code to streamline the relinquishment process:
 - o Providing an online relinquishment form through the Cherokee Nation Tribal Registration webpage
 - o Establishing a court filing fee of at least \$25 for relinquishment requests through the Cherokee Nation District Court
 - o Granting immediate relinquishment status by finalizing it through a court order, removing the need for individuals to notify the Registration Department
 - o Eliminating the sixty-day withdrawal period for relinquishment requests

Post-Relinquishment Process: By September 30, 2025, recommended reforms include:

- o Extending the exclusion period following relinquishment from five years to a lifetime
- o Limiting the exclusionary period for minors with relinquished citizenship status until they reach 18 years of age
- o Developing a separate re-enrollment process for individuals whose citizenship was relinquished as minors and who wish to return as adults

Registration Department's Alignment with Executive Order on Equality:

The Task Force recommends the following reforms:

- By August 31, 2025, CN Registrar employees will complete diversity sensitivity training through the Otsoliga Learning Portal
- By September 30, 2025, the CN Registrar will revise the CN citizenship application and supporting materials to include:
 - o Clearly labeled documents for Freedmen descendants

- Expanded FAQ section addressing the needs of Freedmen and 2SLGBTQ+ communities
- Notice of birth certificate alternatives, such as maternity/paternity DNA results, to establish ancestry in rare instances of no records
- Expanded instructions for applications involving adoptions, particularly surrogacy and Freedmen adoptions
- Guidelines for updating legal name and gender changes on Cherokee Nation photo IDs
- Channels for reporting issues or concerns related to receiving services
- By January 1, 2026, develop and implement a digital application correspondence system on the Cherokee Nation Website or Gadugi Portal to allow applicants to track their applications and receive electronic updates on their status.

Other Statutory or Process Reforms Not Addressed:

By June 10, 2025, along with Report II, additional identified areas relating to code and policy will be addressed, including:

- Digitization of the CN citizenship application
- CN citizenship revocation process
- Dual citizenship/enrollment

Recommendations

To run an efficient and effective government Cherokee Nation (CN) must ensure through its legal authority that the administration of the citizenship processes is compliant with said legal authority, national interests and fair and equitable practices. Through a comprehensive review it must be recognized and addressed that although processes have evolved, the Registrar operates on a single policy, from the Bureau of Indian Affairs (BIA).

The overarching recommendation of this Task Force is that an in depth process reform is necessary for the Cherokee Nation Registrar (Registrar) and through executive action requires development and adoption of a comprehensive set of policies governing citizenship, and Certificate of Degree of Indian Blood (CDIB) processing, to reflect the subject areas and recommendations outlined in Report I no later than July 31, 2025.

Role of the Registration Committee

The Cherokee Nation Code establishes a Registration Committee, consisting of the Registrar and two assistants. According to the code, it is the duty of the committee to consider the qualifications and determine the eligibility of those applying for CN citizenship.

The current committee was appointed by Principal Chief Hoskin and confirmed by Tribal Council in 2019. The terms for the two assistant appointments expired on October 31, 2023. It has been noted that the Registration Committee does not currently have a standardized process to fulfill its responsibilities.

It is recommended that the Registration Committee appointments be updated by May 2025. Furthermore, the Registration Committee should operate in accordance with its duties as outlined in Constitution of the Cherokee Nation Section 2, Article IV(a) by May 30, 2025. This should include:

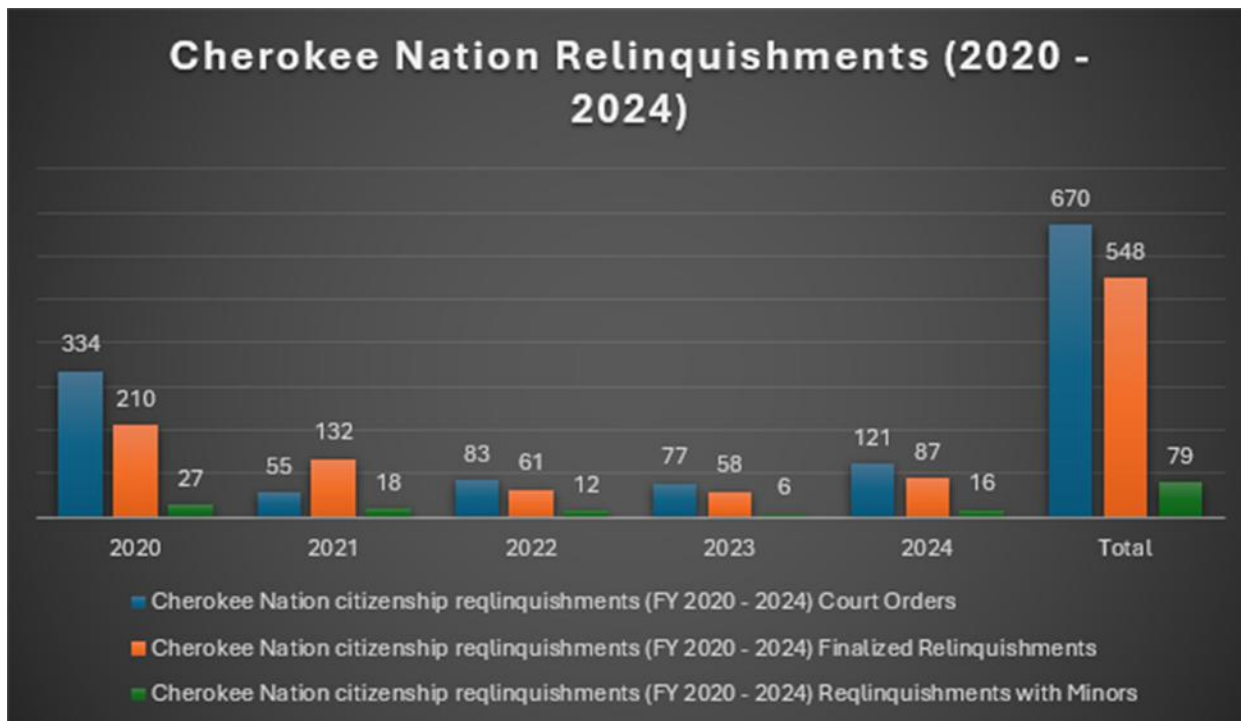
- Attending bi-annual meetings to be informed of any code or process reforms impacting registration procedures and eligibility
- Receiving and reviewing a bi-annual report from the Registration Department concerning registration topics and citizen statistics

Relinquishment Process

The current process for relinquishment is not efficient, primarily due to the window of time between the court hearing and the available 60-day period to submit the finalized written order of relinquishment from the Court to the Registrar by the citizen. This process allows for a 60-day withdrawal period during which individuals can reinstate their citizenship if they wish to terminate the relinquishment process after finalization as well as an additional 30-day period for a court date to be established. In total, a citizen pursuing relinquishment has 150 days to halt the relinquishment process. It is important to note that during this period, individuals can establish membership elsewhere and regain citizenship without delay. The recommendations described herein would result in approximately 119 days being removed from the process.

Given the concerns regarding the 60-day withdrawal window and the possibility of enrolling in another tribe to receive benefits, then withdrawing the Cherokee Nation (CN) relinquishment requests, data on relinquishments was reviewed as part of developing recommendations—from fiscal years 2020 to 2024 (see graph 1 Cherokee Nation Citizenship Relinquishments FY 2020 – FY 2024). The data shows that out of 670 relinquishment requests, 548 (82%) were finalized over the five-year period. Among those 548 relinquished citizenships, no individual returned and completed relinquishment again, including 79 minors who are not subject to an exclusionary period like adults. None of the adults who relinquished their citizenship during this time would have been eligible to return within the same reporting period due to the five-year return eligibility period.

Graph 1 – Cherokee Nation Citizenship Relinquishments (FY 2020 – 2024)



Relinquishment requests cross calendar years, explaining the higher number of relinquishments in 2021 of 132 vs the number of requests and court orders.

The Task Force recommends by September 30, 2025 that code and processes be streamlined to create a more effective process for all involved by also providing the option to obtain the relinquishment request form online

via the CN Registrar webpage, require a court filing fee of at least \$25, the court order be finalized immediately following the court hearing providing immediate relinquishment for any person seeking to leave the Cherokee Nation, the court will submit a certified copy to the Registrar and the 60 day withdrawal period is eliminated.

Post-Relinquishment Application for Citizenship Waiting Periods

Currently, once the relinquishment process is finalized by the Registrar, the individual also forfeits the right to re-enroll as a citizen of CN for five years, with minors being exempt from this exclusionary period. If a former citizen chooses to re-enroll, the process is the same as a new citizenship application.

To better reflect the timely nature of the request to relinquish citizenship, the Task Force recommends that by March 31, 2025, executive actions be implemented, including code reform, and by September 30, 2025, the development and adoption of associated policies will allow:

- The exclusion period to be extended from five years to a lifetime
- Minors with relinquished citizenship status will face a limited exclusionary period until they reach 18 years of age, after which they would be eligible to re-enroll with CN as adults
- A separate and distinguishable process for re-enrollment will be developed for individuals whose citizenship was relinquished as minors and wish to return as adults

Alignment of Registrar Citizenship Process with the Executive Order on Equality

To align the Registrar with the Executive Order on Equality, reviews of current processes and discussions with the Registrar, CN employees, and citizens were conducted to identify barriers. The Task Force found continued inequities, especially affecting Cherokee Freedmen descendants and 2SLGBTQ+ communities. Freedmen face challenges with citizenship applications, including a lack of specific instructions and birth certificates. 2SLGBTQ+ individuals encounter issues with name changes and amended documents.

Executive action is recommended to overhaul the CN Citizenship Code by May 30, 2025, with legislation and policies developed by July 31, 2025, and initiatives outlined below:

- By September 30, 2025: Review and revise the CN application for citizenship and associated documents to:
 - Clearly label documents for Freedmen descendants
 - Expand the FAQ section for Freedmen and 2SLGBTQ+ needs
 - Provide alternatives to birth certificates, like paternal/maternal DNA results
 - Expand instructions for adoptions, including surrogacy and Freedmen applications
 - Guidelines for updating legal name and gender changes on Cherokee Nation photo IDs
 - Establish a clear avenue for reporting issues related to inequality
- By January 1, 2026: Develop a digital version of the revised application available via the Registrar webpage or Gadugi Portal, allowing applicants to track status and receive electronic correspondence
- By August 31, 2025: Coordinate with the Otsoliga Learning Portal to conduct diversity sensitivity training for Registrar employees and cross train all staff on how to communicate with all applicants regardless of circumstance

Other Statutory or Process Reforms

The Task Force's review has identified two areas of reform that are important for the ongoing modernization and integrity of Cherokee Nation's registration processes. These areas include, but are not limited to, and will be further addressed in Task Force Report II on June 10, 2025:

- Digitization of the citizenship application process
- Process of citizenship revocation
- Dual citizenship/enrollment

Conclusion

The Task Force advises following the actions presented in Task Force Report I, which include revisions to statutes and codes to support the development and implementation of the related policies.

Sources:

- Cherokee Nation Code, Title II "Citizenship"
- Cherokee Nation Registration Citizenship Application
- Cherokee Nation Registration website
- CDIB Compact with the United States Department of the Interior Bureau of Indian Affairs
- Executive Order 2020-05-CTH on Equality
- 2024 Addendum to Executive Order 2020-05-CTH on Equality